

EXHIBIT A

Table of Offenses Regarding CMS Personnel, Contractors, Volunteers

Date ¹	Offense(s)	Discipline	Process	Bates #
02/2003	Nurse alleged to possess a stun gun and mace inside HOC	Barred	Internal investigation including interview of individual	000762- 000763
05/2004	Individual alleged to be bringing cigarettes into HOC to give to inmate who was individual's brother; failed to report that brother was an inmate; improper interaction between individual and brother while brother was an inmate	Barred	Apparent internal investigation	001834
07/15/04	Individual received criminal summons dated 07/15/04 to answer charges of A&B and ABDW arising out of incident that occurred 07/09/04	Barred	Individual notified SCSD of criminal summons and provided copy of police reports	001851, 001857- 001862
02/09/05	Nurse housed inmate in medical unit and failed to notify medical director; failed to document in inmate's medical chart; failed to document any information relating to her decision to house inmate and her interaction with inmate; during internal investigation, was not truthful in statements about attempts to contact medical director; did not properly explain failure to contact HSA was disingenuous during a subsequent internal investigation	Barred for three days ²	Internal investigation including interview of individual	001063- 001078

¹ The date is when the incident occurred. Where a specific incident date is not available, an approximate incident date is inferred and used herein.

04/27/05	Nurse alleged to have passed contraband to inmate	Barred	Internal investigation including individual providing statement	001137-001150
05/2005	Physician's assistant altered an officer's medical report to state that officer suffered traumatic tooth loss without identifying date officer allegedly suffered tooth loss and without actually observing what was documented	Physician's assistant's contract terminated; individual barred	Internal investigation	001589-001597
2005	Reverend alleged to have engaged in numerous instances of failing to follow rules and procedures of HOC, including giving a pen to an inmate, failing to write a report in a timely manner about same, being late regularly for Bible study resulting in security problem, engaging in unauthorized reentry work with inmates, and switching location of services without consulting HOC supervisory personnel, which conduct and other conduct occurred over a several month period	Barred and contract to provide religious services terminated	Internal investigation including multiple conversations with individual	001835-001845
12/06/05	Medical assistant brought contraband, specifically pornographic magazines and a cell phone, into infirmary disregarding express instructions to place items into personal locker	Barred	Internal investigation including individual submitting written statement	001849, 001852-001856

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² Plaintiff believes that the referenced individual subsequently was barred indefinitely for different offense(s), but Defendants have failed to produce underlying documents relevant to the subsequent barring.

Table of Reporting Violations and Discipline Imposed

Date¹	Reporting Offense(s) and Underlying Misconduct	Policy(s) Violated	Discipline Imposed	Bates #
2003	Introduced unauthorized food into inmate housing unit; failed to properly maintain logbook; allowed certain inmates to remain out of cells for unauthorized purposes	S-220	Two day suspension	001726
2003	Filed numerous false and misleading incident reports and use of force reports; repeatedly covered up use of excessive force by other jail officers; repeatedly failed to take affirmative or remedial actions when officers used excessive force against detainees; lied to SID; interfered with SID into investigations into use of excessive force by officers; initially lied to FBI about knowledge of and involvement in use of excessive force and cover-up; never reported actions of other officers	S-220	Termination	001752- 001753
2003	Repeated instances of conduct unbecoming; misleading, incorrect, or false reports; possession of contraband within institution; accepting contraband from or delivering same to inmate; inappropriate familiarity with inmate; failing to report interaction with inmates to supervisor; dereliction of duty	S-220	Termination	001781
2003 or 2004	Failed to conduct cell checks resulting in deprivation of minimum care to which an inmate was entitled exposing Department to serious liability; falsification of log book and report regarding same [inference is that inmate might have died]	Unspecified	Termination	001794

¹ The date is when the incident occurred. Where a document fails to provide an incident date, an approximate incident date is inferred and used herein.

01/16/03	Abuse of inmate; conduct unbecoming; submission of misleading, incorrect, or false report in connection with physical abuse of inmate	S-220; S-501; S-505	Termination	001787
01/26/03	Failed to provide a written report on K-9 usage despite being ordered 3 times to file report	S-220	Written warning	001728
03/16/03	Submitted a misleading, incorrect, or false report (a finding made following testimony in USDC)	S-220	90 day suspension	001744
03/17/03	Failure to maintain unit logbook and record all events occurring during shift	S-220	Written warning	001702
03/18/03	Failed to maintain unit log books and record all events that occurred during shift	S-220	Written warning	001684
05/03/03	Conduct unbecoming; neglect/dereliction of duty; engaging in amusement that interferes with job performance due to failure to keep logbook up to date and playing video games while on duty	S-220	Three day suspension	001693
Late summer 2003	Allowed an unauthorized civilian to enter HOC secure perimeter; false reporting; incomplete or misleading statements	S-220; S-501; S-517	90 day suspension; one-year probationary period	001710-001711 see also 001708-001709

10/07/03	Submitted false, misleading, or inaccurate report and conduct unbecoming in connection with filing written report claiming to have witnessed two separate assaults on a detainee by other detainee(s) including allegation that one detainee kicked another detainee in the head	S-220	20 day suspension	001666- 001668
11/21/03	Failed to submit a detailed report upon receipt of a dangerous weapon and failed to notify security upon receipt of information that "inmate was in fear of his health and turning over a weapon to you" [sic]	unspecified	Written warning	001674
11/26/03	Neglect or dereliction of duty; unauthorized absence from post; improper conduct negatively reflecting upon department; failure to provide supervision of inmates; failure to inspect a post and report a safety problem; failure to report a health-related situation; failure to routinely and purposefully patrol and inspect assigned areas; failure to report and correct matters related to officer duties, unit procedures, and safety/security, with reference made to "averting the tragedy that occurred"	S-220; S-501	45 day suspension	001676- 001677
01/05/04 01/08/04	Involvement in an altercation resulting in injuries and the summoning of police; filing a misleading, inaccurate, and untimely report re: altercation	S-220	Written warning	001751
04/02/04	Submitting an incorrect, misleading, or false report where officer was sleeping on duty and submitted a report denying sleeping on duty	S-220	14 day suspension and limited one year probationary period	001704- 001705

08/25/04	Failure to submit truthful incident report and improper use of vehicle because officer improperly utilized lights and sirens and provided inconsistent oral and written reports regarding purported justification for lights and sirens	S-220; S-122; S-530	Five day suspension	001694- 001695
08/25/04	Failed to submit truthful report regarding partner's use of emergency lights and sirens during prisoner transport to hospital and improperly utilized lights and sirens	S-220; S-530	Five day suspension	001767- 001768
01/24/05	Violations of post orders; neglect/dereliction of duty; filing false/misleading reports where two detainees went to infirmary in a.m.; upon their return to the unit, a third detainee was with the first two; and officer failed to notice and/or log the presence of the third detainee resulting in a lock-down of the facility and an emergency head count	Violations of post orders; S-220	One-day suspension	001739- 001740
01/28/05	Neglect/dereliction of duty; failed to maintain possession and security of key to weapon locker; failed to immediately report security/safety violation, in connection with discovering that a canister of OC was missing and failing to report same for several hours; impermissibly gave keys to other officers to remove firearms and other equipment	S-220; S-501; S-502	One day suspension	001670- 001671
03/06/05	Failed to maintain logbook and log entries properly	Unspecified	Oral warning	001750
04/09/05	Arrested by FBI and Sheriff's Department on indictment charging	S-220	Termination	001799-

	distribution and conspiracy to distribute heroin and marijuana; entered guilty plea to superseding indictment, in connection with introduction of drugs/contraband into HOC			001800, 001797
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